## LAW OFFICES OF DALE K. GALIPO DALE K. GALIPO, ESQ. (SBN 144074) dalekgalipo@yahoo.com MARČEL F. SINCICH, Esq. (SBN 319508) 3 msincich@galipolaw.com 21800 Burbank Boulevard, Suite 310 Woodland Hills, CA 91367 4 Phone: (818) 347-3333 | Fax: (818) 347-4118 5 Attorneys for Plaintiff MARGARITA LOPÉZ SANCHEZ 6 7 ROB BONTA, State Bar No. 202668 Attorney General of California JON S. ÁLLIN, State Bar No. 155069 8 Supervising Deputy Attorney General JEREMY DUGGAN, State Bar No. 229854 9 Deputy Attorney General 1300 I Street, Suite 125 10 P.O. Box 944255 Sacramento, CA 94244-2550 11 Telephone: (916) 210-6008 Fax: (916) 324-5205 12 E-mail: Jéremy.Duggan@doj.ca.gov Attorneys for Defendants 13 Macomber, Barretto, Lewis, Choate, Gipson, Davis, Marion, Dobie, and Lynch 14 IN THE UNITED STATES DISTRICT COURT 15 FOR THE EASTERN DISTRICT OF CALIFORNIA 16 SACRAMENTO DIVISION 17 18 MARGARITA LOPEZ SANCHEZ, Case No.: 2:23-cv-01011-MCE-AC 19 Plaintiff. [Honorable Morrison C. England, Jr.] 20 Magistrate Judge Allison Claire V. 21 JOINT STIPULATION TO EXTEND TIME FOR PLAINTIFF TO 22 CALIFORNIA DEPARTMENT OF **AMEND** CORRECTIONS AND 23 REHABILITATION, ET AL., 24 Defendants. 25 26 Plaintiff Margarita Lopez Sanchez and Defendants California Department of Corrections and Rehabilitation, and California State Prison, Sacramento, 27 28 Macomber, Barretto, Lewis, Choate, Gipson, Davis, Marion, Dobie, and Lynch Case No. 2:23-cv-01011-MCE-AC

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## 1 (together called "the parties") submit the following Joint Stipulation to Extend Time for Plaintiff to Amend, based on the following good cause: 2 On April 24, 2024, the Court issued its Order Granting, with 20 days leave to 3 amend, Defendants' Motion to Dismiss. (Doc. 18). 4 On May 6, 2024, the parties filed their joint Status Report re Settlement 5 6 pursuant to this Court's November 15, 2023, Minute Order. (Doc. 19.) Therein, the parties informed the Court that Plaintiff is in the process of amending the 7 complaint, and the parties are engaged in informal settlement discussions. Further, 8 9 the parties believe it is appropriate that discovery, and the Rule 26(f) conference in this matter, should continue to be stayed until such time as all remaining 10 11 Defendants have filed an answer in the case. Provided that it may take approximately 30 days for defense counsel to discuss 12 the matter internally and respond to Plaintiffs' demand, the parties believe that it is 13 the best interest of supporting the parties' efforts to resolve this matter to extend the 14 time for Plaintiff to amend the complaint in accordance with this Court's Order. 15 16 Therefore, the parties agree and stipulate that there is good cause to permit Plaintiff an extension to file an amended complaint, from June 14, 2024 to July 18, 17 2024. 18 IT IS SO STIPULATED. 19 20 Respectfully submitted, LAW OFFICES OF DALE K. GALIPO Dated: May 10, 2024 21 22 Marcel Sincich MARCEL SINCICH 23 Attorney for Plaintiff 24 ROB BONTA, Attorney General of California Dated: May 10, 2024 25 JON S. ALLÍN, SUPERVISING Deputy Attorney General 26 Jeremy Duggan Jeremy Duģgan 27 Deputy Attorney General Attorneys for Defendants 28 Case No. 2:23-cv-01011-MCE-AC

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